

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Eric J. Holcomb

Bruno L. Pigott

Commissioner

January 19, 2018

Ms. Leslie Blake, SR-6J U.S. EPA, Region V 77 West Jackson Boulevard Chicago, IL 60604

Dear Ms. Blake:

Re:

Draft Proposed Plan, Operable Unit 3 Keystone Corridor Groundwater Contamination Superfund Site Indianapolis, IN

Staff of the Indiana Department of Environmental Management (IDEM) have reviewed the above-referenced document dated December 2017 and offer the following comments for your consideration:

General Comments:

- In the "Site Geology and Hydrogeology" discussion in Section C of the document, the shallow groundwater flow direction for the portion of the site located north of Fall Creek is stated to be to the west/southwest and north. Please confirm that there is a northerly shallow groundwater flow direction component on this portion of the site.
- 2. It is understood that the specific details of the costs for the vapor intrusion mitigation systems necessary for any particular building on site will be determined during the Remedial Design phase. However, the average estimated costs for the installation and maintenance of the sub-slab depressurization systems presented in Table 6 of the document are significantly greater than what would be expected for such systems in this area based on the experience of IDEM staff with similar systems.
- 3. The remedial action levels presented in Table 5 of the document, as well as the screening levels and removal management levels presented in Tables 1 and 2, are acceptable.



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Thank you for the opportunity to provide comments on the draft Proposed Plan for Operable Unit 3 of the Keystone Corridor Groundwater Contamination Superfund site. If you have any questions concerning these comments, please don't hesitate to contact me at (317) 234-7179.

Sincerely,

Douglas M. Petroff

Federal Programs Section

Douglas M. Petroff

Office of Land Quality

DMP:tr

cc: Rex Osborn, IDEM